

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - : SEALED INDICTMENT
:
MARCO CASO, : 20 Cr. 125
JOHN CICERO, :
IRMA MATERASSO, :
ERIC BAKER, and :
MATHEW MATTEO, :
a/k/a "Matthew Mateo," :
:
Defendants. :
----- X

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2017 through in or about February 2020, in the Southern District of New York and elsewhere, MARCO CASO, JOHN CICERO, IRMA MATERASSO, ERIC BAKER, and MATHEW MATTEO, a/k/a "Matthew Mateo," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MARCO CASO, JOHN CICERO, IRMA MATERASSO, ERIC BAKER, and MATHEW MATTEO, a/k/a "Matthew Mateo," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United

States Code, Section 841(a)(1).

3. The controlled substance that MARCO CASO, JOHN CICERO, IRMA MATERASSO, ERIC BAKER, and MATHEW MATTEO, a/k/a "Matthew Mateo," the defendants, and others known and unknown, conspired to distribute and to possess with the intent to distribute was 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

4. The controlled substance that MARCO CASO, JOHN CICERO, IRMA MATERASSO, and MATHEW MATTEO, a/k/a "Matthew Mateo," the defendants, and others known and unknown, conspired to distribute and to possess with the intent to distribute was a mixture and substance containing a detectable amount of gamma-butyrolactone (known as "GBL"), in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Indictment, MARCO CASO, JOHN CICERO, IRMA MATERASSO, ERIC BAKER, and MATHEW MATTEO, a/k/a "Matthew Mateo," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or

indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSET PROVISION

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred, or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been comingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

Patricia Gaultier
FOREPERSON

FOREPERSON

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

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MATERASSO, ERIC BAKER, and MATHEW
MATTEO, a/k/a "Matthew Mateo,"

Defendants.

SEALED INDICTMENT

20 Cr.

(21 U.S.C. § 846.)

GEOFFREY S. BERMAN
United States Attorney

Denie Dailey
Foreperson